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8 Attorney for the Plaintiff

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SARAH TRACY, an individual,

Plaintiff,

v.

CHURCHILL COUNTY JUSTICE OF  
THE PEACE BENJAMIN TROTTER, and  
CHURCHILL COUNTY, a political  
subdivision of the state of Nevada, et al.,

Defendants.

Case No.: 3:24-cv-00288-ART-CSD

**STIPULATION AND ORDER FOR  
EXTENSION OF DISCOVERY  
DEADLINES  
[Second Request]**

Plaintiff SARAH TRACY ("Plaintiff") and Defendants CHURCHILL COUNTY  
JUSTICE OF THE PEACE BENJAMIN TROTTER and CHURCHILL COUNTY  
("Defendants") (collectively, the "Parties"), by and through their respective counsel,  
hereby stipulate and agree that the discovery cut-off and related deadlines in this case be  
extended for a period of 30 days.

This is the second request for an extension of these deadlines. This request is  
made in good faith and is not for the purpose of delay. The extension is necessary to  
complete e-discovery of electronically stored information that will form the foundation for  
expert analysis and subsequent expert reports. The parties anticipate that their respective  
experts will need to analyze electronic communications, digital records, and metadata that

1 are still being collected and processed. This analysis is crucial for the preparation of  
2 thorough expert reports. Pursuant to LR 26-4, the parties provide the following information  
3 to the Court in connection with their request for an extension of discovery deadlines:  
4

5 **A. Statement of Discovery that has been Completed**

6 The parties have exchanged initial disclosures pursuant to FRCP 26(a). Plaintiff  
7 has served interrogatories and requests for production of documents on Defendant  
8 Churchill County.

9 **B. Description of the Discovery that Remains to be Completed**

10 The parties need to complete the collection and processing of electronically stored  
11 information that will be essential for expert analysis. This includes electronic  
12 communications, digital records, and associated metadata that must be properly  
13 preserved and analyzed. Following the completion of e-discovery, the parties will need to  
14 provide these materials to their respective experts for review and incorporation into their  
15 expert reports. Additional written discovery, including requests for production,  
16 interrogatories, and requests for admission, as well as depositions of parties and  
17 witnesses, will also need to be completed.  
18

19 **C. Proposed Schedule for Completing all Remaining Discovery**

20 **Discovery Cut-Off Date:**

21 Existing: Friday, April 18, 2025

22 New: Monday, May 19, 2025

23 **Amending Pleadings and Adding Parties:**

24 Existing: Tuesday, January 21, 2025

25 New: Thursday, February 20, 2025

26 **Expert Disclosures:**

1 Existing: Tuesday, January 21, 2025

2 New: Thursday, February 20, 2025

3 **Rebuttal Expert Disclosures:**

4 Existing: Monday, March 3, 2025

5 New: Wednesday, April 2, 2025

6 **Dispositive Motions:**

7 Existing: Monday, May 19, 2025

8 New: Wednesday, June 18, 2025

9 **Joint Pretrial Order:**

10 Existing: Wednesday, June 18, 2025

11 New: Friday, July 18, 2025

12 **Extensions or Modifications of Discovery Plan:**

13 Existing: Friday, March 28, 2025

14 New: Monday, April 28, 2025

15 (signature on following page)

1 IT IS SO STIPULATED.  
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4 DATED: December 21, 2024  
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7 BY: /s/ Luke Busby, Esq.  
8

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16

17 DATED: December 21, 2024  
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20 BY: /s/ Katherine Parks, Esq.  
21

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25 Suite B  
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27 775-786-2882  
28 Email: [kfp@thorndal.com](mailto:kfp@thorndal.com)

16 IT IS SO ORDERED:  
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21 UNITED STATES MAGISTRATE JUDGE  
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24 DATED: December 23, 2024  
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